



3 10 0960

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

File #	
Project #	3.10
Date	

4772

JUL 14 1994

4WD-SSRB

Jeff D. Wyatt
Senior Environmental Engineer
Chevron Chemical Company
6001 Bollinger Canyon Road
San Ramon, CA 94583-0947

SUBJ: EPA Review
Draft Remedial Investigation (RI) Report
Chevron Chemical NPL Site - Orlando, FL

Dear Mr. Wyatt:

Enclosed please find the initial EPA review comments regarding the document noted above. Additional comments may be forthcoming from EPA and the State of Florida and will be transmitted to you as soon as possible. Please revise the document as indicated by the enclosed comments. If you have any questions, please contact me at (404) 347-2643, ext. 6241.

Sincerely,

Randy Bryant
Senior Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Susan Tobin, TASK Environmental

3 10 0961

ENCLOSURE
EPA REVIEW COMMENTS ON DRAFT RI REPORT
CHEVRON CHEMICAL NPL SITE

GENERAL

EPA has completed its initial review of the RI report, but additional comments may be forthcoming. The report generally follows EPA guidance for content and organization of a RI report. Extensive material has been presented regarding the fate and transport of organic compounds in groundwater.

However, additional discussion and evaluation of the potential mobility of metals in groundwater should be provided. Apparently, the source and extent of metals in groundwater have not been fully delineated. At a minimum, the RI should further evaluate the potential mobility of metals such as lead and chromium using existing data. Such data may include redox conditions, estimated groundwater velocities, etc.

The RI should consolidate all sampling data to be used in the Risk Assessment. Therefore, please include the most recent verification/consolidation data from the removal.

Also, after your receipt of the revised Risk Assessment, please ensure consistency of the RI with the Risk Assessment. This will include such items as contaminants of concern, etc.

SPECIFIC

1. Page ii, List of Figures: Please provide a figure, similar to Figure 4-3, which shows the groundwater concentrations for xylene through September 1993.
2. Page E-7, second bullet: Ethylbenzene was detected at a concentration of 2,000 ppb in MW-8S.
3. Page E-8, last paragraph: If the presence of DEHP is due to sampling equipment, then it should have been detected in quality control samples, such as the equipment blanks. If not, then delete this sentence. Also, correct the phrase, "...and each was detected in only one (poet Removal Action) well."
4. Page E-9, second full paragraph: Does the last sentence, "Removal of these source areas...", refer to additional excavation to be conducted on-site?
5. Page E-9, third full paragraph: The last sentence should be revised or deleted given that metals are COCs and

3 10 0262

biodegradation is not expected to reduce the metals concentrations.

6. Page 1-2, second paragraph: What endpoints were used to establish a distance of 1,000 feet between the Site and Lake Fairview? A distance of 700 feet seems more realistic.
7. Page 2-6, first paragraph: One sentence indicates that several wells, including MW-3S and MW-3D, could not be sampled during the Phase II sampling. However, analytical data from Phase II for these wells are presented in other sections of the RI report.
8. Page 3-4, last paragraph: Is there now or has there been any surface water runoff to the southwest as reported in the Site Screening Report (NUS, dated July 1990)?
9. Page 3-16: What is the distance to, and approximate location of, the nearest private drinking water well?
10. Page 4-4, Table 4-1: It is difficult to determine if the data from table 4-1 of the RI was a subset of the data used to calculate the 95% UBCI of the average chlordane concentration in soil remaining onsite. Under separate cover, specify the data used in those calculations.
11. Page 4-33, last paragraph: What explanation is offered for the presence of lead in monitoring well 3s? The lead concentration averaged 200 ppb for the most recent sampling event.
12. Page 4-36, first paragraph: References to Hubbard Construction and Unocal should be deleted unless conclusive data establishing these properties as sources is submitted.
13. Page 4-36, second paragraph: Provide data and references to support the hypothesis that chromium in groundwater may have been released from septic tanks in the area.
14. Page 4-36, last paragraph: Delete the last sentence regarding the insignificant health risk of 1,4-dichlorobenzene. Such statements are more appropriate in the Risk Assessment.
15. Pag 5-31, last paragraph: Identify any analytical results from the monitoring wells that indicate the presence of degradation by-products of the contaminants of concern.